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DOC #:  
DATE FILED: 6/17/2021

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June 16, 2021

VIA ECF

Judge Mary Kay Vyskocil  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

In re: *United States v. Encarnacion-Velez et al. (on behalf of Leuris Sabala-Mejia)*, 21-CR-225

Dear Judge Vyskocil:

I write to request a modification of Mr. Sabala-Mejia's bond condition from home detention to a curfew, from 8am to 10pm. Mr. Sabala-Mejia has sole physical custody of his children. They have multiple medical, school, family and social appointments throughout the week that require his supervision and physical presence. He also must obtain their food and other necessities on a regular basis, and needs time to be able to shop for and with them. He has been fully compliant with all conditions to date, and his pretrial officer supports this modification request. Pretrial is appreciative of his challenge as a single father and believes a curfew is the most suitable condition for Mr. Sabala-Mejia. The government also consents to this modification.

Therefore, Mr. Sabala-Mejia requests an immediate modification of his bond condition from home detention to a curfew, from 8am to 10pm.

Thank you for your consideration of this request.

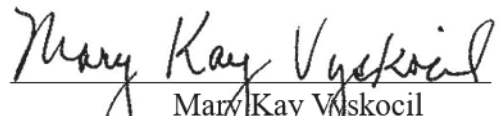
Sincerely,



Susan K. Marcus, Esq.  
Attorney for Leuris Sabala-Mejia

This request to modify the conditions of Sabala-Mejia's pretrial release is **GRANTED IN PART**. He shall observe a curfew from 6 PM to 8 AM and may leave home confinement between the hours of 8 AM and 6 PM without pre-clearance from Pretrial Services. His travel shall remain restricted to SDNY/EDNY. He should not expect further modifications of the conditions of his release.

Date: June 17, 2021  
New York, New York



Mary Kay Vyskocil  
United States District Judge